

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address Christopher Celentino (131688) Yosina M. Lissebeck (201654) Tyler Powell (Ky. Bar No. 90520 - admitted pro hac vice) Dinsmore &amp; Shohl LLP, 655 West Broadway, Suite 800 San Diego, California 92101 Tel: (619) 400-0500 Fax: (619) 400-0501 christopher.celentino@dinsmore.com yosina.lissebeck@dinsmore.com tyler.powell@dinsmore.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Richard A. Marshack, Trustee</p>	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</b>	
<p>In re: The Litigation Practice Group P.C.,</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 8:23-bk-10571-SC ADVERSARY NO.: 8:25-ap-01208-SC CHAPTER: 11</p>
<p>Richard A. Marshack, Trustee of the LPG Liquidation Trust,</p> <p style="text-align: right;">Plaintiff(s).</p> <p>vs.</p> <p>Oxford Knox, LLC; Buffalo 21 Partners, Inc. et. al.</p>	<b>JOINT STATUS REPORT [LBR 7016-1(a)(2)]</b>
<p style="text-align: right;">Defendant(s).</p>	<p>DATE: 09/18/2025 TIME: 11:00 a.m. COURTROOM: 5C ADDRESS: 411 West Fourth Street, Santa Ana, CA 92701</p>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

**A. PLEADINGS/SERVICE:**

1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)?  Yes  No
2. Have all parties filed and served answers to the Claims Documents?  Yes  No
3. Have all motions addressed to the Claims Documents been resolved?  Yes  No
4. Have counsel met and conferred in compliance with LBR 7026-1?  Yes  No

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

Three Defendants, Lexicon Consulting, LLC; United Partnerships, LLC; and Ventura Consulting, LLC have filed a Motion to Dismiss Plaintiff's Complaint against them. The Motion is set for a hearing on October 23, 2025.

All other parties represented by Golden Goodrich LLP have served responses.

**B. READINESS FOR TRIAL:**

1. When will you be ready for trial in this case?

Plaintiff Unknown but after August 1, 2026      Defendant August 1, 2027.

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff Case involves claims against multiple defendants with many transfers. Both sides will need fact discovery and may need to retain expert witnesses for solvency.      Defendant Defendants agree with Plaintiff's explanation.

3. When do you expect to complete your discovery efforts?

Plaintiff Unknown but not sooner than June 1, 2026      Defendant June 1, 2027.

4. What additional discovery do you require to prepare for trial?

Plaintiff Discovery has not yet begun. The parties will need to engage in fact discovery and may need to retain experts if solvency is an issue.      Defendant Defendants agree with Plaintiff's explanation.

**C. TRIAL TIME:**

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff Unknown and contingent upon the number of defendants going to trial. Two weeks or more may be needed.      Defendant Defendants agree with Plaintiff's explanation.

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff 10-15 again dependent on the number of defendants at trial.      Defendant 15-30 dependent on the number of defendants appearing at trial.

3. How many exhibits do you anticipate using at trial?

Plaintiff  
Unknown at this time.

Defendant  
Unknown at this time.

**D. PRETRIAL CONFERENCE:**

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff  
Pretrial conference  is  is not requested  
Reasons:

Defendant  
Pretrial conference  is  is not requested  
Reasons:

Plaintiff  
Pretrial conference should be set after \_\_\_\_\_  
(date) 08/01/2026

Defendant  
Pretrial conference should be set after \_\_\_\_\_  
(date) 08/01/2027

**E. SETTLEMENT:**

1. What is the status of settlement efforts?

Plaintiff: Parties have started settlement discussions for some defendants where the amount transferred is relatively small and/or where facts are not in dispute.

Defendant: Parties are also discussing the merits of all claims and defenses. Discussions are ongoing.

2. Has this dispute been formally mediated?  Yes  No  
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff  
 Yes  No

Defendant  
 Yes  No

**F. FINAL JUDGMENT/ORDER:**

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

I do consent  
 I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

I do consent  
 I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

**G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL:** (*Use additional page if necessary*)

Plaintiff: Length and complexity of trial will depend on number of defendants going to trial and the amount of transfers to each defendant that subject to avoidance after the completion of discovery.

Defendant: Defendants agree with the Plaintiff's assessment. However, Defendants also suggest that while the court could set a pre-trial conference and discovery deadlines in 2026, the parties are likely going to ask to continue these proceedings and as such, these deadlines should be set in 2027.

Respectfully submitted,

Date: 09/04/2025

DINSMORE & SHOHL LLP

Printed name of law firm

/s/ Tyler Powell

Signature

Tyler Powell

Printed name

Attorney for: Richard A. Marshack, Trustee

Date: 09/04/2025

Golden Goodrich LLP

Printed name of law firm



Signature

Anerio V. Altman

Printed name

Attorney for: Attorney for Oxford Knox Defendants\*

\* See Exhibit 1 for List of Represented Parties

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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

## **EXHIBIT 1**

Oxford Knox, LLC.  
Buffalo 21 Partners, Inc.  
Jason Dovalina  
Rachel Dovalina  
Syed Faisal Gilani aka Sye Gilani  
BAE Enterprises, Inc.  
Samson Ly  
BEW Solar Management, LLC  
Lexicon Consulting, LLC  
United Partnerships, LLC  
Ventura Consulting, LLC  
Matthew Church  
Frank Brown  
Validation, LLC  
Spectrum Payment Solutions, LLC  
Home Energy Solutions, Inc.  
JNR Services, Inc.  
C.A.T. Exteriors, Inc.  
AZLS Enterprises, Inc.  
INVESTLINC Wealth Services, Inc.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
100 West Main Street, Suite 900, Lexington, Kentucky 40507

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 09/04/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 09/04/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Judge's Courtesy Copy  
Honorable Scott C. Clarkson  
United States Bankruptcy Court  
Central District of California, Santa Ana Division  
411 West Fourth Street, Suite 5130/ Courtroom 5C  
Santa Ana, CA 92701-4593

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

09/04/2025      Tyler Powell  
Date                Printed Name

/s/ Tyler Powell  
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **Leslie A Cohen** [leslie@lesliecohenlaw.com](mailto:leslie@lesliecohenlaw.com),  
[jaime@lesliecohenlaw.com](mailto:jaime@lesliecohenlaw.com); [bryn@lesliecohenlaw.com](mailto:bryn@lesliecohenlaw.com)
- **David M Goodrich**  
[dgoodrich@g02.law](mailto:dgoodrich@g02.law),  
[kadele@g02.law](mailto:kadele@g02.law); [dfitzgerald@g02.law](mailto;dfitzgerald@g02.law); [wgllp@ecf.courtdrive.com](mailto:wgllp@ecf.courtdrive.com)
- **Yosina M Lissebeck** [Yosina.Lissebeck@Dinsmore.com](mailto:Yosina.Lissebeck@Dinsmore.com),  
[caron.burke@dinsmore.com](mailto:caron.burke@dinsmore.com); [ayrton.celentino@dinsmore.com](mailto:ayrton.celentino@dinsmore.com)
- **Richard A Marshack (TR)** [pkraus@marshackhays.com](mailto:pkraus@marshackhays.com),  
[ecf.alert+Marshack@titlexi.com](mailto:ecf.alert+Marshack@titlexi.com)
- **Tyler Powell** [tyler.powell@dinsmore.com](mailto:tyler.powell@dinsmore.com),  
[lydia.tharp@dinsmore.com](mailto:lydia.tharp@dinsmore.com); [wendy.yones@dinsmore.com](mailto:wendy.yones@dinsmore.com)
- **United States Trustee (SA)** [ustpregion16.sa.ecf@usdoj.gov](mailto:ustpregion16.sa.ecf@usdoj.gov)

**2. SERVED BY UNITED STATES MAIL:**

Bae Enterprises, Inc.  
Attn: Cloud Peak Law, LLC, Registered Agent  
1095 Sugarview Drive, Suite 500  
Sheridan, Wyoming 82801